

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

GREG ABBOTT, in his capacity as
GOVERNOR OF THE STATE OF TEXAS,
and THE STATE OF TEXAS,

Defendants.

Case No. 1:23-cv-00853-DAE

UNITED STATES' EXHIBIT LIST

In accordance with the Court's scheduling order (ECF 97) and Rule 16(f)(4), the United States identifies the following Exhibit List. This list includes those exhibits that the United States expects to offer, as well as those it may offer if the need arises, with each set so identified.

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P-0281	Email from Maxwell Hamilton, to Hillary Quam, et al. Readout: HFAC Brief on TX Water Negotiations.	DOS_0169712		*
P-0282	Email from Sally Spener, to Francisco Sainz, et al. Follow up on my meeting with Resendez.	DOS_0170381	*	
P-0283	Email from Francisco Sainz, to Maxwell Hamilton, et al. HFAC Request for Brief --IBWC- 1944 Treaty.	DOS_0174935	*	
P-0284	Email from Ken Salazar, to Mark Johnson, et al. AMLO daily press conference - July 26, 2023.	DOS_0180615		*
P-0285	Mananera Live: AMLO details Secretary Barcena's trip to Washington			*
P-0286	Email from "International", to "mexcitysintesis@state.gov". English Language News/Aug 22, 2023/Evening.	DOS_0186517		*
P-0287	Email from David Suarez, to "Mexico City-Mananera Live". Mananera Live--United States omnibus: AMLO talks USMCA, Texas, Florida, fentanyl.	DOS_0188419		*

P-0288	Email from Luis Ramirez, to "Mexico City-Mananera Live". Mananera Live: AMLO sends letter praising POTUS; He blasts the UN.	DOS_0188869		*
P-0289	Email from Hillary Quam, to "Mexico City Tasker - POL", et al. AMLO daily press conference - August 28, 2023.	DOS0193083		*
P-0290	Diplomatic note from the Ministry of Foreign Affairs.	DOS0193125	*	
P-0291	Email from Sally Spener, to "jgould@usbr.gov", et al. Can IBWC sign our Rio Grande Minute in Boulder City this week?	IBWC0000384		*
P-0292	Email from Sally Spener, to Maria Elena Giner, et al. Canceled: Rio Grande Minute Signing.	IBWC0000387		*
P-0293	Email from Sally Spener, to Maria Elena Giner, et al. Clarify text edits RE: New draft Rio Grande Minute for review/discussion this week.	IBWC0000394		*
P-0294	Email from Sally Spener, to Francisco Sainz. Rio Grande Policy Work Group mid-summer update webinar - July 31 proposed.	IBWC0000602		*
P-0295	Email from Sally Spener, to Maria Elena Giner, et al. Status of Rio Grande meetings?	IBWC0000614		*
P-0296	Email from Sally Spener, to Francisco Sainz. Follow up on my meeting with Resendez.	IBWC0000928		*
P-0297	Email from Francisco Sainz, to Sally Spener, et al. HFAC Follow up Request for Brief --IBWC- 1944 Treaty.	IBWC0000951		*
P-0298	Email from Sally Spener, to Krista Kyle. Postponed meeting with Chihuahua.	IBWC0001052		*

P-0299	Letter from Adriana Resendez Maldonado, to Maria-Elena Giner. Field visit performed by this Mexican Section.	IBWC0001603		*
P-0300	Letter from Adriana Resendez Maldonado, to Maria-Elena Giner. Follow up on 6/9/2023 letter.	IBWC0001607		*
P-0301	Letter from Adriana Resendez Maldonado, to Maria-Elena Giner. Follow up on 6/9 and 7/14/2023 letters.	IBWC0001610		*
P-0302	Letter from Jose de Jesus Luevano Grano, to Maria-Elena Giner. Response to 8/10/2023 letter regarding activities carried out by the State of Texas.	IBWC0001613		*
P-0303	Letter from Maria-Elena Giner, to Adriana Resendez Maldonado. Response to 6/9/2023 letter regarding personnel, vehicles, and equipment observed within the Rio Grande.	IBWC0001623		*
P-0304	Letter from Maria-Elena Giner, to Adriana Resendez Maldonado. Response to 7/26/2023 letter regarding construction activities carried out by the State of Texas.	IBWC0001629		*
P-0305	Letter from Maria-Elena Giner, to Adriana Resendez Maldonado. Response to 7/26/2023 letter regarding construction activities carried out by the State of Texas.	IBWC0001632		*
P-0306	Letter from Maria-Elena Giner, to Adriana Resendez Maldonado. Response to 08/14/2023 letter regarding construction activities carried out by the State of Texas.	IBWC0001636		*

P-0307	Letter from Maria-Elena Giner, to Adriana Resendez Maldonado. Realignment of the barrier buoys undertaken by the State of Texas to move the buoys closer to the United States.	IBWC0001640		*
P-0308	Memo from John Claudio, to Ramon Macias III. Binational Survey of State of Texas buoys in Eagle Pass TX.	IBWC0003233		*
P-0309	Email from Ramon Macias, to Padinare Unnikrishna, et al. Report on floating barriers.	IBWC0004998		*
P-0310	Email from Maria Elena Giner, to Francisco Sainz, et al. Field Survey.	IBWC0006070		*
P-0311	Email from Francisco Sainz, to Jennifer Pena, et al. Field Survey.	IBWC0006071		*
P-0312	Email from Mario Castro, to Juan Uribe, et al. Survey boat safety check.	IBWC0006866		*
P-0313	Email from Mario Gomez, to Ramon Macias, et al. CILA survey at Eagle Pass.	IBWC0008385		*
P-0314	Email from Loren Flossman, to Victor Escalon, et al. River Floating Fence//Pontoon.	STATE_003590		*
P-0315	Texas Turns the Tide.	STATE_003624		*
P-0316	Email from Madeleine Winslow, to Jeffrey Gilmore, et al. Cochrane//DPS 7.14.23.	STATE_004028		*
P-0317	Buoy Project End of Week Report 7.14.23.	STATE_004030		*
P-0318	Email from Loren Flossman, to Victor Escalon, et al. Floating you barrier System.	STATE_004036		*
P-0319	Email from Loren Flossman, to Victor Escalon, et al. Issues Passive discs between buoys.	STATE_004041		*

P-0320	Email from Isaac Gonzalez, to Madeleine Winslow, et al. Cochrane//DPS 7.14.23.	STATE_004046		*
P-0321	Email from Arturo Delagarza, to Loren Flossman, et al. RIVER FLOATING FENCE.	STATE_004048		*
P-0322	Email from Andrew Mahaleris, to Tabatha Vasquez, et al. WSJ request: border buoys.	STATE_004049		*
P-0323	Email from Coulter Tallent, to Tony Pena, et al. Border Update - 1045 CT, 14 Jun 2023.	STATE_004056		*
P-0324	Floating Barrier System (FBS) Evaluation Report Outbrief.	STATE_004086		*
P-0325	"8. Impacts from FBS to Agencies Operating Along the Rio Grande River".	STATE_004124		*
P-0326	Floating Buoy Barrier Update to DPS Regional Director Victor Escalon.	STATE_004142		*
P-0327	Texas Department of Public Safety. Floating Barrier System Evaluation Report.	STATE_004184		*
P-0328	Videoconference Deposition of Heather Lee Miller, PHD.			*
P-0329	Rio grandee River, Expert Report.			*
P-0330	Expert Report Regarding the Historical Navigability of the Lower Rio Grande, Particularly in the Eagle Pass-Piedras Negras Area.			*
P-0331	Deposition of F. Douglas Shields, Jr., PhD.			*
P-0332	"F.D. Shields' Testimony."			*
P-0333	Reasonableness of proposed improvement of the Rio Grande for navigation downstream of Amistad Dam.			*

P-0334	Funding and Managing the U.S. Inland Waterways System: hat Policy Makers Need to Know: What Policy Makers Need to Know.			*
P-0335	Engineering and Design Layout and Design of Shallow-Draft Waterways.			*
P-0336	Evaporative Losses from Major Reservoirs in Texas.			*
P-0337	"Boundaries of new navigation channel."			*
P-0338	Deposition of Ancil Taylor.			*
P-0339	Expert Report of Ancil Taylor.			*
P-0340	Data table.			*
P-0341	Barge Transportation.			*
P-0342	Aerial photograph.			*
P-0343	Aerial photograph.			*
P-0344	Aerial photograph.			*
P-0345	"Water Elevations."			*
P-0346	Oral Deposition of Kathy Ann Alexander, PhD.			*
P-0347	Letter from Johnathan Stone, to Brian Lynk. Identification of State Defendants' Anticipated Expert Witness.			*
P-0348	Water Code § 11.023.			*
P-0349	Water Code § 11.121.			*
P-0350	30TAC § 297.1.			*
P-0351	Water Code § 11.0235.			*
P-0352	Water Code § 11.096.			*
P-0353	Deposition of Thomas Ciarametaro.			*
P-0354	Expert Witness Report.			*
P-0355	Thomas P. Ciarametaro, Jr. CV.			*
P-0356	Oral Deposition of Christine Marie Magers.			*
P-0357	Environmental Resources & Impacts Review Rio Grande River.			*

P-0358	Expert Opinion Report on Rio Grande Navigation and Reasonable Improvements to Incrementally Improve Navigation on River Miles 275.5 to 610.0.			*
P-0359	List of photograph files.			*
P-0360	List of PDFs.			*
P-0361	Map.			*
P-0362	Oral Deposition of Carlos Rubinstein.			*
P-0363	Expert Report on Water and Water Right Impacts Along the Rio Grande in Texas - Particularly as it Relates to Navigation as a Beneficial Use of Water.			*
P-0364	Carolos Rubinstein CV.			*
P-0365	Rio Grande/Rio Bravo River Basin.			*
P-0366	Water Code § 1.003.			*
P-0367	Oral Deposition of Michael Banks.			*
P-0368	Drone footage.			*
P-0369	Aerial photograph.			*
P-0370	Aerial photograph with notations.			*
P-0371	Photograph.			*
P-0372	Photograph.			*
P-0373	Photograph.			*
P-0374	Photograph.			*
P-0375	Photograph.			*
P-0376	Photograph.			*
P-0377	Oral Deposition of Herman Robert Settemeyer.			*
P-0378	Herman Robert Settemeyer CV.			*
P-0379	Oral Deposition of Eleftherios Iakovou, Ph.D.			*
P-0380	Expert Opinion Report Prepared by: Eleftherios Iakovou, Ph.D.			*
P-0381	Email from Johnathan Stone, to Andrew Knudsen, et al. Terms re: Lefteris Depo.			*
P-0382	Oral and Videotaped Deposition of Micky Donaldson.			*

P-0383	Defendants' Second Amended Notice of Intent to Take Oral and Videotaped Deposition of the U.S. Army Corps of Engineers Pursuant to Rule 30(b)(6).			*
P-0384	"CBP is responsible for the enforcement of CBP and other agency laws and regulations in order to protect consumers and the U.S. Economy from: . . .".			*
P-0385	Email from Melanie Casner, to Timothy MacAllister, et al. Customs and Border Protection and U.S. Border Patrol Watercraft Assets and Operations in the Rio Grande.	US0002301	*	
P-0386	Enforcing the law at the border.			*
P-0387	Email from Micky Donaldson, to "DRT OPS DIV". DPS Buoy Deployment Update.	CBP0000319		*
P-0388	Expert Opinion Report. 6. Is the marine floating barrier a hazard to navigation?			*
P-0389	Videotape Deposition of Margaret Gaffney-Smith.			*
P-0390	Defendants' Second Amended Notice of Intent to Take Oral and Videotaped Deposition of the U.S. Army Corps of Engineers Pursuant to Rule 30(b)(6).			*
P-0391	33 CFR Part 329 Definition of Navigable Waters of the US.			*
P-0392	Aerial photo from drone footage.			*
P-0393	Map.			*
P-0394	U.S. Waterway Data. National Waterway Network.			*
P-0395	Aerial photo from drone footage.			*
P-0396	Oral and Videotaped Deposition of Ivan Morua.			*
P-0397	Vessel Layout Master Plan Enlarged Plan.			*

P-0398	Port of Harlingen Master Plan.			*
P-0399	City Council Special Meeting.			*
P-0400	Videotaped Oral Deposition of Isela Canava.			*
P-0401	Defendants' Second Amended Notice of Intent to Take Oral and Videotaped Deposition of the U.S. Section of the International Boundary and Water Commission Pursuant to Rule 30(b)(6).			*
P-0402	Letter from Brian Lynk, to Ryan Walters. Fed. R. Civ. P. 30(b)(6) witness designations of USIBWC.			*
P-0403	Flood and Emergency Operations Manual Amistad Dam and Power Plant Project.			*
P-0404	International Boundary and Water Commission (IBWC) United States and Mexico U.S. Section. About Us.			*
P-0405	9 Stat. 928 (Feb. 2, 1848) -- Treaty with the Republic of Mexico, Article VII.			*
P-0406	United States v. Rio Grande Dam & Irrigation Co. 174 U.S. 690 (1899).			*
P-0407	Convention Between the United States of America and The United States of Mexico.			*
P-0408	Binational Border Solutions Strategic Plan Fiscal Years 2021 - 2025.			*
P-0409	International Boundary and Water Commission weighs in on new buoy system along the Rio Grande.			*
P-0410	IBWC wants to study Texas governor's plans to put buoys in middle of Rio Grande.			*
P-0411	The other border dispute is over an 80-year-old water treaty.			*

P-0412	Sinkholes in Amistad Dam threaten international border water reservoir.			*
P-0413	Status of Deliveries and New Minute.			*
P-0414	USIBWC Stream Gaging Program & Water Data Portal.			*
P-0415	30(b)(6) Videotape Deposition of the Coast Guard By and Through Retired Captain Kevin Kiefer and Captain Michael Cintron.			*
P-0416	Defendants' Amended Notice of Intent to Take Oral and Videotaped Deposition of the U.S. Coast Guard Pursuant to Rule 30(b)(6).			*
P-0417	Oral and Videotaped Deposition of Walker Smith.			*
P-0418	Port Director to Serve as GPA President.			*
P-0419	Port Director Appointed to PAAC.			*
P-0420	Walker Smith, Port of Harlingen's Port Director Appointed to TxDOT Port Authority Advisory Committee.			*
P-0421	Expanding Possibilities Annual Report 2020 - 2021.			*
P-0422	The Port of Harlingen Authority. Globally connected, community invested.			*
P-0423	Rising Tide. 2022 - 2023 Annual Report.			*
P-0424	"Facilities."			*
P-0425	"Facilities"			*
P-0426	Email from J.J. Harder, to Sean Torriente, et al. OS Law Enforcement Brief 21 July.	DOS 0031501		*
P-0427	Email from Mark Johnson, to Rachel Poynter, et al. TX Buoy Barrier Ruling.	DOS 0035380		*
P-0428	Email from Mark Johnson, to Brian Naranjo. TX Buoy Barrier Ruling.	DOS 0050208		*

P-0429	Email from Francisco Sainz, to Maxwell Hamilton, et al. HFAC Request for Brief --IBWC- 1944 Treaty.	DOS_0069265		*
P-0430	Email from Mark Johnson, to Ken Salazar. TX Buoy Barrier Ruling.	DOS_0118940		*
P-0431	Email from Eric Jacobstein, to Mark Wells. Readout from Barcena dinner and bilat with S1.	DOS_0120030		*
P-0432	Email from Mark Johnson, to Ken Salazar. TX Buoy Barrier Ruling.	DOS_0146320		*
P-0433	Re: TX Buoy Barrier Ruling			*
P-0434	Memo from "SECSTATE WASHDC". The Secretary's July 21 Conversation with Mexican FS Barcena.	DOS_0199858	*	
P-0435	Memo from "SECSTATE WASHDC". The Secretary's August 10, 2023, Meeting with Mexican FS Barcena.	DOS_0199862	*	
P-0436	Memo from "SECSTATE WASHDC". Secretary Blinken's Participation in the January 19, 2024 Migration Ministerial with Mexico.	DOS_0199871	*	
P-0437	Daily Activity Report.	DOS_0199884		*
P-0438	Email from Francisco Sainz, to Francisco Sainz. Translation letter. Request intervention on the removal of barriers along the Rio Grande Floodplain.	DOS0191798		*
P-0439	Fwd: Follow up on my meeting with Resendez			*
P-0440	Email from Ramon Macias, to Padinare Unnikrishna, et al. Report on floating barriers.	IBWC0004304		*
P-0441	Email from Jennifer Pena, to Sally Spener, et al. AMLO Comments on Rio Grande Barriers.	IBWC0005709		*

P-0442	Email from Jennifer Pena, to Francisco Sainz, et al. UPDATE re: "inflatable" Wall on water?	IBWC0006146		*
P-0443	Email from Francisco Sainz, to Sally Spener, et al. News reports - TX buoys are in Mexico, Mx sends dip note RE: AMLO Comments on Rio Grande Barriers.	IBWC0006687		*
P-0444	Regulatory Decision Sheet.	USACE0000113		*
P-0445	Regulatory Decision Sheet.	USACE0000241		*
P-0446	Regulatory Actions.	USACE0000295		*
P-0447	Regulatory Decision Sheet.	USACE0000383		*
P-0448	Letter from Wayne Lea, to A. Brad Groves. Proposal by the city of Eagle Pass to construct a boat ramp and conduct bank stabilization work on the Rio Grande River.	USACE0000385		*
P-0449	Navigable Waters of the United States in the Fort Worth, Albuquerque, and Tulsa Districts Within the State of Texas.	USACE0000502		*
P-0450		USACE0006646		*
P-0451	Email from Neil Lebsock, to Calvin Kroeger. Chief's RFI.	USACE0007998		*
P-0452	Definition of Navigable Waters of the United States, 37 Fed. Reg. 18,289 (Sep. 9, 1972).	USACE0008329		*
P-0453	List of Bridges Over the Navigable Waters of the United States.	USACE0008333		*
P-0454	Granting consent of Congress to Texas-Coahuila Bridge Company for construction of a bridge across the Rio Grande between Eagle Pass, Texas, and Piedras Negras, Mexico. H.R. 4034, 69th Cong. (1926).	USACE0009245		*
P-0455	Bridge Across the Rio Grande at Eagle Pass, Tex. Report.	USACE0009247		*
P-0456	Title 33 - Navigation and Navigable Waters, Chapter II - Corps of Engineers, War Department.	USACE0009249		*

P-0457	Environmental Assessment for Facilities Expansion at Naval Nuclear Power Training Unit-Charleston (NPTU Charleston), Joint Base Charleston, South Carolina.	USACE0009487		*
P-0458		USACE0011072		*
P-0459	Environmental Handbook. Water Resources.	USACE0011155		*
P-0460	Email from Pete Crum, to "MRC - jpa Permits", et al. JPA SUBMITTAL: Norfolk Naval Shipyard (Portsmouth VA) - Waterfront Port Security Barrier System Installation.	USACE0011392		*
P-0461	Email from "MRC - jpa Permits", to Lou Atkins. MHI Lambert's Point Force Protection.	USACE0011443		*
P-0462	Letter from Stephen Decker, to Louis Pfingst. Department of the Army permit application to construct a Port Security Barrier.	USACE0011473		*
P-0463	Email from Jessica Barker, to "MRC - jpa Permits". Permit Application for the Installation of New Anchors for the Existing Port Security Barrier System at Naval Station Norfolk, Norfolk, VA.	USACE0011488		*
P-0464	Letter from Kimberly Prisco-Baggett, to W. David Noble. Department of the Army permit application to upgrade the existing Port Security Barrier system.	USACE0011520		*
P-0465	Email from Michael Anderson, to Marshall Smith, et al. Navy Waterfront Barrier at Naval Station.	USACE0011533		*
P-0466	Letter from J. Robert Hume, to Commander Navy Region. Proposed Barrier at the Norfolk Naval Base.	USACE0011537		*

P-0467	Email from Michael Anderson, to Stephen Powell, et al. Review of recent submittals from U.S. Navy (Waterfront Anti-Terrorism Barrier).	USACE0011548		*
P-0468	Email from Rebecca Francese, to "MRC - jpa Permits", et al. BAE Systems - Security Barrier, Norfolk, VA.	USACE0011556		*
P-0469	Email from Justine Woodward, to Beth Howell. BAE Security Barrier - Section 408 Review.	USACE0011568		*
P-0470	Memorandum for Records. Department of the Army Memorandum Documenting General Permit Verification.	USACE0011581		*
P-0471	Memorandum for Record. Department of the Army Memorandum Documenting Nationwide Permit Verification/General Permit Verification.	USACE0011589		*
P-0472	Letter from Kimberly Prisco-Baggett, to Eddie Goldman. Department of the Army application to install 685 linear feet of security barrier.	USACE0011623		*
P-0473	Letter from Brian Denson, to Eddie Goldman. Department of the Army application to install 3,877 linear feet of a floating security barrier.	USACE0011631		*
P-0474	Memorandum for Record. Department of the Army Memorandum Documenting General Permit Verification.	USACE0011742		*
P-0475	Letter from Sage Joyce, to Michael Jones. Department of the Army application to temporarily install a 350 linear foot floating security barrier.	USACE0011773		*

P-0476	Letter from Robert Flowers, to Secretary of the Army. Gulf Intracoastal Waterway, Brazos River to Port O'Connor, Matagorda Bay Re-Route, Texas.	USACE0011972		*
P-0477	Fact Sheet. Intracoastal Waterway Jacksonville to Miami, FL.	USACE0011991		*
P-0478	Fact Sheet. Atlantic Intracoastal Waterway - Norfolk to St. Johns.	USACE0011993		*
P-0479	Fact Sheet Operation and Maintenance.	USACE0011996		*
P-0480	Fact Sheet Operation and Maintenance.	USACE0011997		*
P-0481	Gulf Intracoastal Waterway, TX Operation and Maintenance.	USACE0012004		*
P-0482	The Gulf Intracoastal Waterway Project.	USACE0012011		*
P-0483	Gulf Intracoastal Waterway (GIWW) Caloosahatchee River to Anclote River Dredge Readiness and Operation Plan (DROP).	USACE0012015		*
P-0484	Jacksonville District AIWW/IWW Update.	USACE0012116		*
P-0485	Atlantic Intracoastal Waterway Between <redacted> Norfolk, VA., and the St. Johns River, Florida.	USACE0012131		*
P-0486	Intracoastal Waterway, Jacksonville to Miami, Florida.	USACE0012135		*
P-0487	Olmsted Locks and Dam Project.	USACE0012205		*
P-0488	Photograph.	CBP0000067	*	
P-0489	DPS and TNG Deployment of Floating Barrier System.	CBP0000089	*	
P-0490	Photograph.	CBP0000232	*	
P-0491	Email. Daily Report - Water Buoy.	CBP0000252	*	
P-0492	Buoy Project Daily Report 7.10.2023.	CBP0000254	*	
P-0493	Email from Joel Betancourt. Cochrane//DPS Weekly Check In 7.21.23.	CBP0000262	*	

P-0494	DPS//Cochrane Weekly Check In 7.21.23.	CBP0000264	*	
P-0495	Turn the Tide.	CBP0000271	*	
P-0496	Photograph.	CBP0000329	*	
P-0497	Email to "DRS-SBPA". Situational Awareness: DPS Buoys in EGT AO.	CBP0000766	*	
P-0498	Photograph.	CBP0000771	*	
P-0499	Photograph.	CBP0000772	*	
P-0500	Photograph.	CBP0000773	*	
P-0501	Photograph.	CBP0000774	*	
P-0502	Photograph.	CBP0000775	*	
P-0503	Photograph.	CBP0000776	*	
P-0504	Photograph.	CBP0000777	*	
P-0505	Photograph.	CBP0000778	*	
P-0506	Photograph.	CBP0000798	*	
P-0507	Letter from Maria-Elena Giner, to Adrianna Resendez Maldonado. Regarding activities carried out by the State of Texas in the Rio Grande channel in the area of Eagle Pass, Texas.	IBWC0004404		*
P-0508	Supplement to Ancil Taylor Report			*
P-0509	John Timmel Site Visit Photograph.	US0003573	*	
P-0510	John Timmel Site Visit Photograph.	US0003574	*	
P-0511	John Timmel Site Visit Photograph.	US0003575	*	
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P-0514	John Timmel Site Visit Photograph.	US0003578	*	
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P-0516	John Timmel Site Visit Photograph.	US0003580	*	
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P-0519	John Timmel Site Visit Photograph.	US0003583	*	
P-0520	John Timmel Site Visit Photograph.	US0003584	*	
P-0521	John Timmel Site Visit Photograph.	US0003585	*	
P-0522	John Timmel Site Visit Photograph.	US0003586	*	
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P-0542	John Timmel Site Visit Photograph.	US0003606	*	
P-0543	Mike Chapman Site Visit Photograph.	US0003607	*	
P-0544	Mike Chapman Site Visit Photograph.	US0003608	*	
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P-0546	Mike Chapman Site Visit Photograph.	US0003610	*	
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P-0561	Mike Chapman Site Visit Photograph.	US0003625	*	
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P-0563	Mike Chapman Site Visit Photograph.	US0003627	*	
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P-0913	Certification of Inspection.	USCG0000688		*
P-0914	Certification of Inspection.	USCG0000690		*
P-0915	U.S. Coast Guard Maritime Law Enforcement Manual (MLEM).	USCG0000692		*
P-0916	Chapter 5 - Non Coast Guard Maintained Aids.	USCG0000719		*
P-0917	Aids to Navigation Manual Administration.	USCG0000736		*
P-0918	Jesse Sumpter, REMINISCENCES.		*	
P-0919	Inland Waterway Navigation Value to the Nation.			*
P-0920	USACE Inland Navigation Economics Cost-Benefit Analysis 101.			*
P-0921	Putnam's Semi-Monthly Library for Travelers and the Fireside. The Eagle Pass; or Life on the Border.		*	
P-0922	Defendants' Response to U.S. Requests for Admission.			*
P-0923	Expert Report of Tong Zhao.			*
P-0924	Response to letter regarding activities carried out by the State of Texas.	DOS_0199680		*
P-0925	The withdrawal of the connected buoys and structures, installed by authorities of the State of Texas.	DOS_0199822	*	
P-0926	Field visit performed by this Mexican Section.	DOS0191799	*	
P-0927	DPS//Cochrane Weekly Check In. 6.16.2023.	STATE_007899		*
P-0928	Annual Report of the Quartermaster General.		*	

P-0929	The Fur Trade Review.		*	
P-0930	Journey Through Texas.		*	
P-0931	We aren't asking for permission': Gov. Abbott defends use of concertina wire along El Paso border.			*
P-0932	1870 Census.		*	
P-0933	A Historical Summary Giving the Scope of Previous Projects for the Improvement of Certain Rivers and Harbors.		*	
P-0934	Census.			*
P-0935	Census.			*
P-0936	Appendix A: Sample of water needs calculation.	US0003097	*	
P-0937	Appendix B: Cost Calculations for a System of River Training Structures.	US0003098	*	
P-0938	Rebuttal Expert Report River Training Structures and Other Methods to Reasonably Improve the Navigability of the Rio Grande.	US0003056	*	
P-0939	Appendix D: Sample widths immediately above locks and dams as measured in Google Earth.	US0003100	*	
P-0940	Figure 1: A bank in the inspected portion of the river.	US0003064	*	
P-0941	Figure 2: Idealized schematic of a river as it meanders within its floodplain.	US0003065	*	
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P-0943	Figure 4: Picture of one of the more pronounced rock shoals.	US0003067	*	
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P-0969	Figure 30: Hypothetical layout of RTS on a reach of the Rio Grande.	US0003092	*	
P-0970	Figure 31: Hypothetical layout of RTS on a reach of the Rio Grande.	US0003093	*	
P-0971	Table 1: Selected channel depths and corresponding water needs.	US0003095	*	
P-0972	Title 33 - Navigation and Navigable Waters.			*
P-0973	Chapter I - Coast Guard, Dept. of Transportation.			*
P-0974	Title 33 - Navigation and Navigable Waters.			*
P-0975	Chapter I - Coast Guard, Dept. of Transportation.			*
P-0976	Texas Experts' Omnibus Draft Report Outline (redacted).		*	
P-0977	Cover email to Texas Experts' Omnibus Draft Report Outline (redacted)		*	

The United States reserves the right to offer additional exhibits for impeachment, or as necessary for rebuttal or to refresh a witness's recollection. Additionally, the United States reserves the right to supplement this list and introduce additional exhibits from facts discovered after the submission of this list. The United States cross-identifies all exhibits used or identified by Defendants and reserves the right to introduce any such exhibits.